Joel Brecount
ThermaTru Corporation
108 Mulzfeld Road
Butler, IN 46721

Re: **033-11605**
First Significant Permit Modification to
Part 70 No.: T 033-7972-00019

Dear Mr. Brecount:

ThermaTru Corporation was issued a permit on November 12, 1998 for a stationary metal doors, sash and trim plastics products manufacturing plant. A letter requesting changes to this permit was received on May 24, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of a door assembly and sheet molding compound production lines and insignificant activities. The changes are as follows with deletions appearing as ~~strikeouts~~ and new language in **bold**:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4

(2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.

(3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1and 3.2, 4.1and 4.2, and 4.3 and 4.4 respectively.

(4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.

(5) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.

(6) Degreasing operations, identified as EU6, consisting of one (1) Safety Kleen cold cleaner and one (1) methylene chloride cold cleaner, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

(7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.

(8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.

(9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.

(10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.

(11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.

(12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

New Skins Warehouse

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

(13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.

(14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 150,000 pounds calcium carbonate, each.

(15) One (1) resin mixer, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.

(16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.

(17) One (1) sheet molding compound press, throughput 18,500 pounds of sheet molding compound per hour.

(18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(5) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.

(6) Paved and unpaved roads and parking lots with public access.

(7) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking.

(8) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38 degrees C).

(9) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(10) One foam press with VOC emissions less than 3 lb/hr and 15 lbs/day.

(11) Two five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day.

(12) Two five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day.

(13) Six (6) above ground resin storage tanks, known as B3-B8 or MTANK-3 through MTANK-8, exhausting through Stack 17.1 and/or Stack 17.2, capacity: 10,000 gallons each, throughput 4,700 pounds of resin per hour with VOC emissions less than 3 lbs/hr and 15 lbs/day.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour, consisting of:

(7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.

(8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.

(9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.

(10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.

(11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.

(12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential emissions of VOC to twenty-five (25) tons per year from the door assembly line adhesive application station must be approved by the Office of Air Management before such change may occur.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the door assembly line adhesive application station shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door assembly line adhesive application station shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.

(c) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$ **where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour**

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the door assembly line adhesive application station and the door machining station and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.4.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

(a) Within 180 days after start-up of the door machining station, known as D2-MS1, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) The Permittee is not required to test the adhesive application station by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the adhesive application station is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.3(a) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Conditions D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.7 Particulate Matter (PM)

The baghouse and cyclone in series for PM control shall be in operation and control emissions from the door machining station at all times that the door machining is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.8 Monitoring

(a) Monthly inspections shall be performed of the adhesive application station coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.9 Visible Emissions Notations

(a) Visible emission notations of the door machining station stack 20.1 exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the door machining station, at least once daily when the machining station is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.11 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the door machining station operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.13 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the door machining operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.4.14 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.15 Record Keeping Requirements

(a) To document compliance with Condition D.4.8, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.4.9, the Permittee shall maintain records of daily visible emission notations of the door machining station stack exhaust.

(c) To document compliance with Condition D.4.10, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Conditions D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.4.11 and D.4.13 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

(13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a bag-house, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.

(14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a bag-house, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 150,000 pounds calcium carbonate, each.

(15) One (1) resin mixer, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.

(16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.

(17) One (1) sheet molding compound press, throughput 18,500 pounds of sheet molding compound per hour.

(18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total potential to emit VOCs from the sheet molding compound production line shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. The total potential to emit VOCs shall be calculated by multiplying the total mass of volatile organic compounds (VOC) in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any VOCs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit VOCs from the sheet molding compound production line. Therefore, this VOC emission limit will render 326 IAC 8-1-6 not applicable to the sheet molding compound production line.

D.5.2 HAPs [326 IAC 2-1-3.4]

The total potential to emit a single and combination of HAPs from the sheet molding compound production line shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. The total potential to emit HAPs shall be calculated by multiplying the total mass of HAPs in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the sheet molding compound production line. Therefore, these HAPs limits will render 326 IAC 2-1-3.4 not applicable to the sheet molding compound production line.

D.5.3 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.5.4 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sheet molding compound production line shall not exceed 18.2 pounds per hour when operating at a process weight rate of 9.25 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silos, known as SILO2 and SILO3, shall not exceed 5.33 pounds per hour each when operating at a process weight rate of 1.48 tons per hour each.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the sheet molding compound production line, including the hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2).

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.6 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.7 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

The hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2) is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994.

The following design requirements for the degreasing operation are applicable:

(a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirement of one of the following:

(1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine, or

(2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ration of 0.75 or greater.

(b) Each owner or operator of a remote -reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent pump that shall be closed at all times except during the cleaning of parts.

(c) Each owner or operator of a batch cold solvent cleaning machine shall comply with the following work and operational practice requirements:

(1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.

(3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.

(4) The owner or operator shall ensure that the solvent level does not exceed the fill line.

(5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of (1) of this section.

(6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.

(7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.

(8) Sponges, fabric, wood and paper products shall not be cleaned.

D.5.8 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the two (2) calcium carbonate silos, known as SILO2 and SILO3, are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Visible Emissions Notations

(a) Visible emission notations of the SILO2 and SILO3 stack 25.2 and 25.3 exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with SILO2 and SILO3, at least once daily when the SILO2 and/or SILO3 are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.5.11 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the SILO2 and SILO3 operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.13 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.1 and D.5.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAPs usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.5.9, the Permittee shall maintain records of daily visible emission notations of the SILO2 and SILO3 stack exhausts.

(c) To document compliance with Condition D.5.10, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure

(2) Documentation of all response steps implemented, per event

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.5.11, the Permittee shall maintain records of the results of the inspections required under Condition D.5.11 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.14 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) Submit an initial notification report immediately to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The report shall include the following information:

(1) The name and address of the owner or operator;

(2) The address of the solvent cleaning machine;

(3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area and existing controls;

(4) The date of installation for the solvent cleaning machine;

(5) The anticipated compliance approach for the solvent cleaning machine;

(6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.

(c) Submit an initial statement of compliance for the solvent cleaning machine. This statement shall include:

(1) The name and address of the owner or operator;

(2) The address of the solvent cleaning machine;

(3) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with Condition D.5.7.

(4) The compliance approach for each solvent cleaning machine.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: ThermaTru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Source Mod. No.: SSM 033-10998-00019
Facility: Sheet Molding Compound Line
Parameter: VOC
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Emissions This Month (tons)	VOC Emissions Previous 11 Months (tons)	VOC Emissions 12 Month Total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: ThermaTru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Source Mod. No.: SSM 033-10998-00019
Facility: Sheet Molding Compound Line
Parameter: VOC
Limit: Single HAP and Combination of HAPs Less than ten (10) and twenty five tons per twelve (12) consecutive month period, respectively

YEAR: _____

Month	This Month (tons)		Previous 11 Months (tons)		12 Month Total (tons)	
	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
MLK/MES
cc: File - Dekalb County
U.S. EPA, Region V
Dekalb County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

ThermaTru Corporation
108 Mutzfeld Road
Butler, Indiana 46721

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 033-7927-00019	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: November 12, 1999
First Significant Source Modification: SSM 033-10998-00019	Pages Affected: 5, 5a, 6, Sections added D.4 and D.5 on pages 39a-m & 43a&b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:
First Significant Permit Modification: SPM 033-11605-00019	Pages Affected: 5, 5a, 6, Sections added D.4 and D.5 on pages 39a-m & 43a&b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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Certification
Emergency/Deviation Occurrence Report
Quarterly Reports
Quarterly Compliance Monitoring Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant

Responsible Official:	Brett Mueller
Source Address:	108 Mutzfeld Road, Butler, IN 46721
Mailing Address:	108 Mutzfeld Road, Butler, IN 46721
SIC Code:	3442 and 3089
County Location:	Dekalb
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4

(2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.

(3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1and 3.2, 4.1and 4.2, and 4.3 and 4.4 respectively.

(4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.

(5) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.

(6) Degreasing operations, identified as EU6, consisting of one (1) Safety Kleen cold cleaner and one (1) methylene chloride cold cleaner, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

(7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.

(8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.

(9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.

(10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.

(11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.

(12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

New Skins Warehouse

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

(13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.

(14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 150,000 pounds calcium carbonate, each.

(15) One (1) resin mixer, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.

(16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.

(17) One (1) sheet molding compound press, throughput 18,500 pounds of sheet molding compound per hour.

(18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(5) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.

(6) Paved and unpaved roads and parking lots with public access.

(7) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic feet and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking.

(8) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(9) A laboratory as defined in 326 IAC 2-7-1(21)(C).

(10) One foam press with VOC emissions less than 3 lb/hr and 15 lbs/day.

(11) Two five thousand (5,000) gallon tanks storing urethane system resin component with VOC emissions less than 3 lb/hr and 15 lbs/day.

(12) Two five thousand (5,000) gallon tanks storing polymethylene polyphenylisocyanate (poly) with VOC emissions less than 3 lb/hr and 15 lbs/day.

(13) Six (6) above ground resin storage tanks, known as B3-B8 or MTANK-3 through MTANK-8, exhausting through Stack 17.1 and/or Stack 17.2, capacity: 10,000 gallons each, throughput 4,700 pounds of resin per hour with VOC emissions less than 3 lbs/hr and 15 lbs/day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) it is a major source, as defined in 326 IAC 2-7-1(22); and

(b) it is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour, consisting of:

(7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.

(8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.

(9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.

(10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.

(11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.

(12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which may increase the potential emissions of VOC to twenty-five (25) tons per year from the door assembly line adhesive application station must be approved by the Office of Air Management before such change may occur.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the door assembly line adhesive application station shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door assembly line adhesive application station shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, shall not exceed 19.3 pounds per hour when operating at a process weight rate of 10.1 tons per hour.

(c) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the door assembly line adhesive application station and the door machining station and any control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.4.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

(a) Within 180 days after start-up of the door machining station, known as D2-MS1, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(b) The Permittee is not required to test the adhesive application station by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the adhesive application station is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.3(a) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Conditions D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.7 Particulate Matter (PM)

The baghouse and cyclone in series for PM control shall be in operation and control emissions from the door machining station at all times that the door machining is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.8 Monitoring

(a) Monthly inspections shall be performed of the adhesive application station coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.4.9 Visible Emissions Notations

(a) Visible emission notations of the door machining station stack 20.1 exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the door machining station, at least once daily when the machining station is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.4.11 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the door machining station operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.4.13 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the door machining operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.4.14 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.15 Record Keeping Requirements

(a) To document compliance with Condition D.4.8, the Permittee shall maintain a log of monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.4.9, the Permittee shall maintain records of daily visible emission notations of the door machining station stack exhaust.

(c) To document compliance with Condition D.4.10, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Conditions D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.4.11 and D.4.13 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

(13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.

(14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 150,000 pounds calcium carbonate, each.

(15) One (1) resin mixer, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.

(16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.

(17) One (1) sheet molding compound press, throughput 18,500 pounds of sheet molding compound per hour.

(18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The total potential to emit VOCs from the sheet molding compound production line shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. The total potential to emit VOCs shall be calculated by multiplying the total mass of volatile organic compounds (VOC) in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any VOCs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit VOCs from the sheet molding compound production line. Therefore, this VOC emission limit will render 326 IAC 8-1-6 not applicable to the sheet molding compound production line.

D.5.2 HAPs [326 IAC 2-1-3.4]

The total potential to emit a single and combination of HAPs from the sheet molding compound production line shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. The total potential to emit HAPs shall be calculated by multiplying the total mass of HAPs in resins applied to the applicators times a flashoff factor of three percent (3%) from AP-42 or a lower emission factor substantiated by a performance test. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the sheet molding compound production line. Therefore, these HAPs limits will render 326 IAC 2-1-3.4 not applicable to the sheet molding compound production line.

D.5.3 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.5.4 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sheet molding compound production line shall not exceed 18.2 pounds per hour when operating at a process weight rate of 9.25 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the calcium carbonate silos, known as SILO2 and SILO3, shall not exceed 5.33 pounds per hour each when operating at a process weight rate of 1.48 tons per hour each.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the sheet molding compound production line, including the hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2).

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.6 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.5.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.7 Halogenated Solvent Cleaning Machine NESHAP [326 IAC 20-6][40 CFR Part 63, Subpart T]

The hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2) is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994.

The following design requirements for the degreasing operation are applicable:

(a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirement of one of the following:

(1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine, or

(2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ration of 0.75 or greater.

(b) Each owner or operator of a remote -reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent pump that shall be closed at all times except during the cleaning of parts.

(c) Each owner or operator of a batch cold solvent cleaning machine shall comply with the following work and operational practice requirements:

(1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.

(3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.

(4) The owner or operator shall ensure that the solvent level does not exceed the fill line.

(5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of (1) of this section.

(6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.

(7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.

(8) Sponges, fabric, wood and paper products shall not be cleaned.

D.5.8 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the two (2) calcium carbonate silos, known as SILO2 and SILO3, are in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Visible Emissions Notations

(a) Visible emission notations of the SILO2 and SILO3 stack 25.2 and 25.3 exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.5.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with SILO2 and SILO3, at least once daily when SILO2 and/or SILO3 are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.5.11 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the SILO2 and SILO3 operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.5.12 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.13 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1 and D.5.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.1 and D.5.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC and HAPs usage for each month; and

(5) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.5.9, the Permittee shall maintain records of daily visible emission notations of the SILO2 and SILO3 stack exhausts.

(c) To document compliance with Condition D.5.10, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and
(B) Cleaning cycle: frequency and differential pressure

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.5.11, the Permittee shall maintain records of the results of the inspections required under Condition D.5.11 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.14 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.1 and D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) Submit an initial notification report immediately to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The report shall include the following information:

(1) The name and address of the owner or operator;

(2) The address of the solvent cleaning machine;

(3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area and existing controls;

(4) The date of installation for the solvent cleaning machine;

(5) The anticipated compliance approach for the solvent cleaning machine;

(6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.

(c) Submit an initial statement of compliance for the solvent cleaning machine. This statement shall include:

(1) The name and address of the owner or operator;

(2) The address of the solvent cleaning machine;

(3) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with Condition D.5.7.

(4) The compliance approach for each solvent cleaning machine.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: ThermaTru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Source Mod. No.: SSM 033-10998-00019
Facility: Sheet Molding Compound Line
Parameter: VOC
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Emissions This Month (tons)	VOC Emissions Previous 11 Months (tons)	VOC Emissions 12 Month Total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Source Mod. No.: SSM 033-10998-00019
Facility: Sheet Molding Compound Line
Parameter: VOC
Limit: Single HAP and Combination of HAPs Less than ten (10) and twenty five tons per twelve (12) consecutive month period, respectively

YEAR: _____

Month	**This Month** (tons)		**Previous 11 Months** (tons)		**12 Month Total** (tons)	
	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	**ThermaTru Corporation**
Source Location:	**108 Mutzfeld Road, Butler, Indiana 46721**
County:	**DeKalb**
Operation Permit No.:	**T 033-7972-00019**
Significant Permit Modification No.:	**033-11605-00019**
SIC Code:	**3442 and 3089**
Permit Reviewer:	**Mark L. Kramer**

On December 21, 1999, the Office of Air Management (OAM) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that ThermaTru Corporation had applied for a Significant Permit Modification to a Part 70 Operating Permit to construct a door assembly line and a sheet molding compound production line. The notice also stated that OAM proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

On January 13, 2000, Emily A. Covert of The Payne Firm, Inc., submitted comments on the proposed modification. The summary of the comments and corresponding responses are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Comment 1:

In the letter from Mr. Paul Dubenetzky, the door machining station is listed as having a capacity of 450 doors per hour or 12,600 pounds per hour. The weight of each door is actually 45 pounds, which would make the capacity 20,250 pounds per hour as with (a), the electric door skin preheat oven. It appears that although the correct throughput was included on process diagrams, the 12,600 number may have inadvertently gone uncorrected on one of the permit application forms, hence this error. The error appears throughout the permit and technical support document. The following are the page numbers and item numbers where this error is found:

Page	Item Number	Correction
5a of 44	(12)	Change 12,600 to 20,250
39a of 44	Section D.4 (two places)	Same as above
39b of 44	Section D.4.3(a)	The allowable emissions rate should be 19.31 pounds per hour given a process weight rate of 10.1 tons per hour (20,250 pounds per hour)
1 of 31 TSD	(f)	Change 12,600 to 20,250
14 of 31 TSD	Door Assembly line - header and (12)	Same as above
16 of 31 TSD	Same as above	Same as above

Please note that the error may exist in other portions of the permit. This table represents our best understanding of the locations where the wrong number was used.

Response 1:

The capacity has been changed from 12,600 to 20,250 pounds per hour in the heading and for the door machining station as follows. The emission calculations do not need to be revised since they were based on the number of doors per hour, not on the weight rate. The allowable PM emission rate in Condition D.4.3(a) and (b) has been revised based on this corrected process weight rate as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Door Assembly Line, capacity: **20,250** ~~12,600~~ pounds of doors per hour or 450 doors per hour

(12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or **20,250** ~~12,600~~ pounds per hour.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Door Assembly Line, capacity: **20,250** ~~12,600~~ pounds of doors per hour or 450 doors per hour, consisting of:

(12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or **20,250** ~~12,600~~ pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door assembly line adhesive application station shall not exceed **19.3** ~~14.1~~ pounds per hour when operating at a process weight rate of **10.1** ~~6.30~~ tons per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, shall not exceed **19.3** ~~14.1~~ pounds per hour when operating at a process weight rate of **10.1** ~~6.30~~ tons per hour.

Comment 2:

In addition to these changes, a few general questions were raised:

Subpart D.5.14 references a Section C - General Reporting. Where is this section?

The permit skips from page 6 of 44 to page 39a of 44 and excludes all of Sections B and C.

Response 2:

The modification is to the existing Part 70 Operating Permit and as stated in the significant permit modification all other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

Upon further review, the OAM has noted that the Technical Support Document had an incorrect permit modification number: The permit number is SPM 033-11605-00019. The language should have been as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Source Background and Description

Source Name:	ThermaTru Corporation
Source Location:	108 Mutzfeld Road, Butler, IN 46721
County:	Dekalb
SIC Code:	3442
Operation Permit No.:	T 033-7972-00019
Operation Permit Issuance Date:	November 12, 1998
Permit Modification No.:	SPM 033-~~11065~~ **11605**-00019
Permit Reviewer:	Mark L. Kramer

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a
Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**ThermaTru Corporation**
Source Location:	**108 Mutzfeld Road, Butler, IN 46721**
County:	**Dekalb**
SIC Code:	**3442**
Operation Permit No.:	**T 033-7972-00019**
Operation Permit Issuance Date:	**November 12, 1998**
Permit Modification No.:	**SPM 033-11605-00019**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Management (OAM) has reviewed a modification application from ThermaTru Corporation relating to the operation of a stationary metal doors, sash and trim plastics products manufacturing plant.

History

On May 24, 1999, ThermaTru Corporation submitted an application to the OAM requesting to add a door assembly line and a sheet molding compound production line and insignificant activities to their existing plant. ThermaTru Corporation was issued a Part 70 permit on November 12, 1998. A Significant Source Modification SSM 033-10998-00019 has been proposed.

Permit Modification

Pursuant to 326 IAC 2-7-12(d), this proposed significant permit modification to the Part 70 Operating Permit, T 033-7972-00019, issued on November 12, 1998, is required to incorporate the first Significant Source Modification SSM 033-10998-00019 into the Part 70 Operating Permit. This proposed permit modification is necessary since the significant source modification is subject to the requirements of 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning Machine). This permit modification will allow for the operation of the facilities covered in the Significant Source Modification SSM 033-10998-00019.

Conclusion

The operation of this a stationary metal doors, sash and trim plastics products manufacturing plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. SPM 033-11605-00019.